

APRIL 1, 2019 RESPONSES OF AEROJET ROCKETDYNE, INC. IN RESPONSE TO EPA
REQUEST FOR INFORMATION UNDER 42 U.S.C. §9604(E) RECEIVED OCTOBER 4,
2018 PERTAINING TO ORANGE COUNTY NORTH BASIN STUDY AREA, ORANGE
COUNTY, CALIFORNIA

INTRODUCTORY STATEMENT AND OBJECTIONS

Aerojet Rocketdyne, Inc. has conducted investigation and remediation activities at its former operating facility at 601-675 South Placentia Avenue, Fullerton, California in cooperation with the Santa Ana Regional Water Quality Control Board ("SARWQCB") since 2006. By and through its May 2, 2018 comments to the Proposed Rule to Add the Orange County North Basin Site to the National Priorities List, much of the information sought through EPA's §104(e) Information Request, has already been provided to EPA. A copy of those comments are attached to this response and incorporated herein. Based on the foregoing, Aerojet Rocketdyne, Inc. objects to this Information Request to the extent it seeks information that is irrelevant, overbroad and unduly burdensome, has already been provided to EPA or is readily available to EPA through its own records and other public agency records, including those on the California State Water Board's Geotracker website.

http://geotracker.waterboards.ca.gov/profile_report?global_id=SL0605973469

Notwithstanding those objections, Aerojet Rocketdyne, Inc. subjects the following responses to EPA's Information Request.

1. State the full legal name, address, telephone number, email address, and positions held by any individual answering any of these questions on behalf of Aerojet Rocketdyne, Inc. (f/k/a, Aerojet-General Corporation) ("the Company"). For ease of reference, Aerojet Rocketdyne, Inc. is referred to herein interchangeably as Aerojet Rocketdyne, Inc, Aerojet, AGC or the Company.

Response to Request No. 1

William Hvidsten, Assistant General Counsel, Aerojet Rocketdyne, Inc. 2001 Aerojet Road, Rancho Cordova, CA 95742 916-351-8524; william.hvidsten@Rocket.com

2. Identify the dates the Company, under any of its current or former business structures, owned and/or operated the facility located at 601-675 South Placentia Avenue, Fullerton, California (the "Facility").

Response to Request No. 2

Aerojet Ordnance Company and Aerojet Manufacturing Company ("AMCO"), both of which were operating units of Aerojet operated at an approximately 50-acre site located at 601 and 629 S. Placentia Avenue in Fullerton, California (the "Site") from approximately 1962 to 1983.

3. Identify the individuals who are or were responsible for environmental matters at the Facility during its operation at this address. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates the individual held such positions.

Response to Request No. 3

Aerojet's operation of the facility occurred from approximately 1962 to 1983. During that time, there may not have been any individual title that referred to "environmental matters. Therefore, Aerojet identifies the following individuals identified in reports, permits or correspondence who may have had a role in manufacturing activities at the facility which involved the possible use of chemicals at the facility. Most of the contact information for the following individuals was obtained between 2005 and 2010 and has not been updated. Aerojet cannot attest to the accuracy of the individual's position, their contact information or whether the individuals are still alive.

Jean Soppett- President /1980-1981; Mr. Soppett also worked at the facility from 1970 to 1978 in positions which included Program Manager, Engineering Manager and Vice President of Engineering and Research; **Ex. 6 Personal Privacy**
[REDACTED]

Jack Valenti- **Ex. 6 Personal Privacy** From 1976-1981, Director, Industrial Relations, (General Valve); 1979-1981- Vice-President of Industrial Relations (AMCO)

J.J. Kilpatrick- **Ex. 6 Personal Privacy** 1961-1963- Engineering Supervisor; 1963-1980- Senior Process Engineer; 1980-1983- Principal Process Engineer

James Doyle- Deceased; 1973-1976- Senior Safety Officer

Dan Price- President/1978-1979; VP Plant Engineering- 1977-1980

L.W. Mullane- President- 1971 to 1977 (Executive VP Aerojet)

J.W. Keating- President AMCO-1971

Michael Fris- VP Quality Control, 1975-1978; VP Nuclear Manufacturing- 1978-1982; responsible for all aspects of nuclear manufacturing (machining, welding, manufacturing, engineering, product control, etc.); **Ex. 6 Personal Privacy**
[REDACTED]

Brian Grant- VP Quality Control- 1980-1982

John Kortenhoven- VP Engineering & Research - 1978-1980

Terry Jenkins- VP Operations- 1980-closure

C.L. Wilkins- VP Business Operations- 1982-closure; oversight of property wind-down and closure

T.G. Katter-VP Management Operations- 1974-1977

Irving Barger- VP Operations- 1973

Melvin J. Moore- VP Management Operations- 1973

Donald Mould- Manager- Employed at facility from 1972 to 1984; Plant Services- 1980-1983; preparation and oversight of installation of new product lines. Ex. 6 Personal Privacy

Eugene Eckes- General Foreman, Maintenance-1974-1982; Worked at facility from 1962 to 1982 in Maintenance; Responsible for all construction and preventative maintenance activities. (Deceased)

J.R. Bonfiglio- Manager, Plant Engineering & Maintenance-1973-unknown

Jack Shockey- VP Manufacturing-1970-closure

4. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the creation, use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate. This includes individuals whose job functions included operations that utilized or generated these hazardous substances, or who were responsible for storing/ filling/disposing of hazardous substances and/or wastes containing the above-identified chemicals. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position.

Response to Request No. 4

See Response to Request No. 3 above.

5. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the physical layout of each operational area of the Facility, who could explain the day-to-day flow of the operations, or who know the location of physical features such as clarifiers, degreasers, and above- and below- ground storage tanks. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position.

Response to Request No. 5

See Response to Request No. 3 above.

6. Explain the Company's present corporate status (e.g., active, suspended, defunct, merged, dissolved) as well as its operational status (e.g., whether and where business operations are currently occurring).

Response to Request No. 6

Aerojet Rocketdyne Inc. is an Ohio corporation (active) with its headquarters located at 222 N. Pacific Coast Highway, El Segundo, CA 90245; current operations include Redmond, WA; Rancho Cordova, CA; Canoga Park, CA; Socorro, NM; Camden, AR; Orange County, VA; Stennis Space Center, MS; West Palm Beach, FL; Orlando, FL; Huntsville, AL; Jonesborough, TN; Washington, DC; and Carlstadt, New Jersey.

7. Provide the date and in which state the Company was incorporated, formed, or organized.

Response to Request No. 7

Aerojet-General Corporation (AGC), created via merger of Crosley Motors, Inc. and Aerojet Engineering Corporation, a Delaware corporation on February 23, 1953. AGC's name was changed to Aerojet Rocketdyne, Inc., effective June 14, 2013.

8. Describe the corporate relationship (e.g., parent, subsidiary, division, predecessor, successor) between the Company and the following entities: Aerojet Ordnance Co.; Aerojet Manufacturing Company; General Valve Company; and Rheem Manufacturing Company, a California corporation. Please also provide the corporate status (e.g., active, suspended, defunct, merged, dissolved) of each of these entities, if known.

Response to Request No. 8

Aerojet Ordnance Co.: a former operating division/business unit of Aerojet; the tradename was registered with Ohio Secretary of State.

Aerojet Manufacturing Company: a former operating division/business unit of AGC

General Valve Company, Inc.: a wholly owned subsidiary of AGC; sold in 1984.

Rheem Manufacturing Company (Rheem): the corporate relationship between Aerojet and Rheem Manufacturing Company is not completely clear. Documents provided with this response do, however, indicate that Aerojet leased the Facility from Rheem and subsequently purchased the Facility from Rheem. Aerojet currently has no corporate relation with Rheem. Further information regarding Rheem is provided in Response to Request No. 13.

9. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates, and identify each business structure under which it existed or operated while at the Facility location. For each business structure and name under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure and name.

Response to Request No. 9

See Response to Request No. 8

10. If the Company operated at the Facility as a subsidiary, division, or other business unit, explain this relationship and identify where the Company fits into the larger company's structural organization.

Response to Request No. 10

AGC was the parent corporation. Aerojet Ordnance Company, Aerojet Ordnance and Manufacturing Company, and Aerojet Manufacturing Company were operating divisions or business units of AGC during the time it operated and/or owned the Facility.

11. If the Company is now using or has ever used a fictitious business name while operating at the Facility, identify the fictitious names and the owners of each fictitious name.

Response to Request No. 11

See response to Request No. 10 above. In addition, Fictitious Business Names were maintained for the latter three divisions/business units.

12. If the Company sold the Facility property, provide the date on which the Facility property was sold and the person or entity to whom it was sold. To the extent known, indicate whether you understand whether the buyer planned to continue the same or similar business operations at the Facility as that conducted by the Company. To the extent you are aware, include any information regarding changes planned by the buyer regarding operations that involve the use, storage, or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate (e.g., plans to add or dismantle clarifiers, plans to change the types of solvents used).

Response to Request No. 12

Aerojet transferred ownership of the facility to McDonnell Douglas Realty Company ("MDRC") in 1984. To the best of Aerojet's knowledge, MDRC did not continue the same or similar business operations at the Facility as Aerojet, but began to develop the property for commercial use.

13. If the Facility was operated by other parties prior to the Company's operations, identify the prior operators and describe the previous operations to the extent known. Describe any changes made to operations by the Company after it began operating at the Facility that changed (e.g. increases or decreases in) the use or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

Response to Request No. 13

Rheem Automotive Corporation owned the site from approximately September 1955 to April 30, 1967 when Aerojet acquired the property. Site investigation reports indicate that Rheem's facility included one large factory building on the site as early as December 1955 and included several press pits. Rheem's operations included chrome plating of bumpers. Aerojet leased a portion of the Rheem property from April 30, 1962 to April 30, 1967 when it acquired the property. Aerojet subleased approximately 64% of the building to Fruehauf (Military Products Division and/or Fruehauf Trailer Factory) until approximately 1968. Records indicate Fruehauf utilized acetone, oil, paints, thinners, and flammable liquids. A Fire Inspection Report dated

October 16, 1967 indicated Fruehauf Trailer Factory operated at the facility and used flammable liquids.

14. For any period of time in which the Company owned the Facility under any of its current or former business structures and leased the Facility, provide the name, address, and phone number of any tenants and/or lessees at the Facility.

Response to Request No.14

Fruehauf Automotive Corporation and Fruehauf Trailer Factory. Aerojet has no information as to the current contact information for these entities.

General Valve- See discussion of General Valve in Response to Request No. 8

15. For any period of time in which the Company under any of its current or former business structures operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner and/or lessor.

Response to Request No.15

Rheem Investment Company. The address identified in the 1967 transaction documents is "400 Park Avenue, New York 22, NY."

16. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and any products manufactured or services performed at the Facility. Describe any significant changes in Facility size, the Company's number of employees, and the products manufactured or services performed over time.

Response to Request No.16

The Facility owned/operated by Aerojet occupied approximately between 48 and 53 acres and had a workforce of approximately 400-600 employees. There were as many as 15 or 16 building structures on the property. Aerojet Manufacturing Company operations included the machining of component parts for nuclear reactors, as well as weapon vessels and casings as a defense contractor for the U.S. military. The main type of weapon vessels and casings manufactured at the facility were Minuteman State 2 and Polaris missiles.

Please note that the documentation identifies a "nuclear building". Aerojet does not believe that it assembled, tested or performed maintenance on fully operational weapons or that there were any operational or fully assembled "nuclear weapons reactors" at the facility. Aerojet manufactured component parts, i.e. metal containment vessels, at the Facility.

17. Provide a map of the Facility showing the locations of buildings and significant features on the property at the time that the Company operated at the Facility. Indicate the locations of any maintenance shops, machine shops, degreasers, clarifiers, plating areas, painting areas, cooling towers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a narrative physical description of the Facility and identify the following:
 - a. Surface structures (e.g., buildings, tanks, containment areas, storage areas);
 - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers);

- c. Past and present stormwater drainage system and sanitary sewer system, including septic tanks and subsurface disposal fields;
- d. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the Facility or to the property itself (e.g., excavation work) and the dates on which such changes occurred; and
- e. The location of all waste storage or waste accumulation areas as well as waste disposal areas (e.g., dumps, leach fields, burn pits).

Response to Request No.17

The information requested above will be provided in the documents to be produced.

18. Indicate on a map of the Facility or in narrative form each location where any of the following chemicals were used, stored, generated, spilled, or disposed of: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate. Describe any manufacturing or treatment processes in which any of these chemicals were used.

Response to Request No.18

The chemicals used at the Facility, storage locations and processes, potential releases, environmental investigation and remediation, etc. are well documented in the various permits and reports submitted in conjunction with this response.

19. Provide copies, both originals and updates, of hazardous material business plans and chemical inventory forms submitted to city, county, and/or state agencies for the Facility.

Response to Request No.18

The chemicals used at the Facility, storage locations and processes, potential releases, environmental investigation and remediation, etc. are well documented in various permits and reports submitted in conjunction with this response.

20. Provide a list of all chemicals and hazardous substances used at the Facility that contained any of the following: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

Response to Request No.20

The chemicals used at the Facility, storage locations and processes, potential releases, environmental investigation and remediation, etc. are well documented in various the permits and reports submitted in conjunction with this response.

21. For any PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate used at or transported to or from the Facility, identify and provide the following information:
- The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance;
 - The locations where each chemical or hazardous substance is or was used, stored, and disposed of;
 - The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
 - The quantity purchased (in gallons) and the time period during which it was used; and
 - Copies of Material Safety Data Sheets for all hazardous substances used that contain any of these chemicals.

Response to Request No.21

The chemicals used at the Facility, storage locations and processes, potential releases, environmental investigation and remediation, etc. are well documented in various the permits and reports submitted in conjunction with this response. Aerojet incorporates the information contained therein as its response to this request.

22. Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including, but not limited to, data or information, related to soil contamination, soil sampling, soil gas sampling indoor air sampling, geology, groundwater, surface water, and hydrogeology.
- a. State whether the information provided represents a complete list of all soil, soil gas, indoor air, and groundwater sampling conducted at the Facility. If you are aware of any other investigations or sampling reports for which the Company does not have a copy, describe the date and type of sampling conducted, and provide information on where EPA might obtain the report and related documents.
 - b. State whether the Company is aware of any planned future soil, soil gas, indoor air, or groundwater sampling at the Facility property, and if so, please describe.

Response to Request No. 22:

- a. The documents to be produced or which are available on the Geotracker website contain numerous environmental investigation and remediation related reports. Aerojet does not represent that these contain the entire universe of such reports.
 - b. Aerojet performs work at the former facility as directed by the Regional Water Quality Control Board. Currently, AR is required to conduct groundwater sampling on a periodic basis.
23. Identify and provide copies of all agency orders, correspondence, and/or workplans regarding any soil, soil gas, indoor air, and/or groundwater sampling at the Facility that was ordered or agreed to be performed but that was never completed. Explain, to the best of your ability, why the sampling was not completed.

Response to Request 23:

To the best of Aerojet's knowledge, it has conducted all investigation and remediation activities at the site since 2005 at the direction of the RWQCB, but has conducted the work without the issuance of any formal orders.

24. Provide copies of any due diligence reports or property transfer assessments related to the Facility.

Response to Request No. 24

To the best of its knowledge, Aerojet does not possess any due diligence reports or property transfer assessments related to the Facility other than those submitted as part of this response.

25. Identify, and provide the following information for, all groundwater wells located at the Facility:
- a. A map with the specific locations of the groundwater wells;
 - b. Dates of well construction;

- c. Depth to groundwater, depth of well, and depth to and of screened intervals;
- d. Uses of each well;
- e. Date each well was abandoned, if applicable; 1. Dates each well was sampled;
- g. All constituents analyzed for during groundwater sampling events; and
- h. All groundwater sampling results, reports of findings, and analytical data.

Response to Request No. 25

The documents to be produced or which are available on the Geotracker website contain numerous environmental investigation and remediation related reports. Aerojet does not represent that these contain the entire universe of such reports.

26. Provide copies of any applications for permits or permits received for the Facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits (e.g., national pollutant discharge elimination system [NPDES] permits).

Response to Request No. 26

Aerojet objects as to the non-specificity of the media and of the time for issuance of such permits. Without waiving such objection, Aerojet will provide all such permits in its possession that relate to storage, treatment or disposal of hazardous materials. The documents produced do not include copies of air and other types of regulatory authorizations.

27. For each waste stream generated at the Facility, identify the waste and describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

Response to Request No. 27

The chemicals used at the Facility, storage locations and processes, potential releases, environmental investigation and remediation, etc. are well documented in the various permits and reports submitted in conjunction with this response.

28. If the Company discharged any of its waste streams at the Facility to the sewer, identify all locations where waste streams were discharged and provide copies of all permits and all analyses performed on discharged water.

Response to Request 28

See Responses to Requests No. 26 and 27.

29. Describe the methods used by the Company to remove waste streams from sumps at the Facility.

Response to Request 29

Any information Aerojet has in its possession relating to this request is identified in the documents being provided with this response.

30. Identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. Identify and provide supporting documentation of:
- a. The date each release occurred;
 - b. The cause of each release;
 - c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
 - d. Where each release occurred and what areas were impacted by the release; and
 - e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.

Response to Request No. 30

Aerojet objects to this request to the extent it seeks information that is irrelevant, overbroad and unduly burdensome. Numerous releases occurred at the site over a period of approximately 20 years and Aerojet does not have all documentation relating to each and every possible leak, spill or release. Without waiving such objections, the chemicals used at the Facility, storage locations and processes, potential releases, environmental investigation and remediation, etc. are well documented in various the permits and reports submitted in conjunction with this response. Relevant information is also found on the Geotracker website.

31. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of PCE, TCE, 1,1 ,I-TCA, I,I-DCE, 1,4-dioxane, or perchlorate at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

Response to Request No. 31

See objections and Response to Request No. 30.

Orange County North Basin, Orange County, CA
EPA-HQ-OLEM-2017-0603

Aerojet Rocketdyne, Inc. Comments to Proposed Rule to Add the Orange County North Basin
Site to the National Priorities List

May 17, 2018

Aerojet Rocketdyne, Inc. ("AR") believes that EPA's proposed listing of the Orange County North Basin on the National Priorities List, to the extent it might pertain to the former AR facility, is neither necessary nor warranted. AR's primary concern is that the listing will result in duplication of effort and increased investigation, cleanup and oversight costs with respect to individual sites where investigation and remediation activities are well under way or are nearly complete. Our comments are provided below.

Site History

Aerojet Manufacturing Company (Aerojet Rocketdyne, Inc.) operated at an approximately 50-acre site located at 601 S. Placentia Avenue in Fullerton, California (the "Site") from approximately 1962 to 1983. Products included components for U.S. Navy mine programs, pressure vessels for the nation's space programs, specialized hardware for commercial and military jet engines and propellant tanks for the country's MX missile program. Historical operations at the Site and laboratory results for environmental sampling data showed that VOCs, metals and petroleum hydrocarbons had been released to the subsurface and found in soil vapor, soil matrix and/or groundwater samples. PCE and TCE are the most commonly detected VOCs.

Implementation of EW-1 Groundwater Remedy

In 2004, Orange County Water District (OCWD) sued several parties alleging they had discharged VOCs and other hazardous substances resulting in contamination of groundwater within the District. The OCWD suit alleged AR's operations at the Site contributed to the contamination. AR settled the litigation with OCWD in 2007. Under the terms of the Settlement Agreement, AR paid OCWD \$5.2 Million. OCWD, in turn, agreed to acquire property located at 637 S. State College Drive, Fullerton, CA, or a nearby alternate site, and drill and operate an extraction well to remove VOCs from the groundwater. The site and well are referred to as "EW-1". Pursuant to OCWD's October 2005 "Geologist's/Engineer's Report- North Basin Groundwater Protection Project" that was made a part of the Settlement Agreement, EW-1 is to contain the northeastern VOC plume and prevent it from moving downward and into the deeper aquifer zone that provides water to nearby drinking water wells. Despite receiving more than \$5.2 Million from AR in 2007¹, for the express purpose of installing and operating EW-1, OCWD did not install and commence continuous operation of EW-1 until September 27, 2017, nearly 10 years later.

¹ OCWD received AR's third and final installment payment on December 10, 2008.

Investigation and Remediation Activities

AR has been responsive to the requests of the Santa Ana Regional Water Quality Control Board (SARWQCB) with respect to the Site. In 2006, the SARWQCB requested AR to participate in the Spills, Leaks, Investigations and Cleanups (SLIC) Program and since that time AR has conducted an extensive investigation of soil and groundwater at the Site as well as a soil vapor sampling program. VOCs in groundwater potentially migrating from the Site are to be addressed by OCWD's operation of EW-1. AR's May 28, 2015 Work Plan for Additional Groundwater Investigation (incorporated herein as Attachment 1) identifies much of the work accomplished at the Site and includes a Conceptual Site Model. That information can also be accessed through the following link and is incorporated herein:

(http://geotracker.waterboards.ca.gov/esi/uploads/geo_report/1293741583/SL0605973469.PDF)

Pursuant to that work plan, AR installed three additional groundwater monitoring wells which have been routinely sampled since that time. These wells replaced three similarly located wells that were destroyed during site redevelopment discussed below. In January 2018, AR submitted additional information as requested by the SARWQCB. That information is incorporated herein as Attachment 2 and includes 1) analytical summary tables for soil, soil vapor, and grab groundwater results; 2) summary tables for groundwater elevation and monitoring well results from the December 2017 groundwater quarterly monitoring event and 3) Site illustrations, including a site plan, December 2017 groundwater elevation contour map and distribution of PCE/TCE concentrations in groundwater map.

Note that VOC levels in the two on-site down gradient wells have decreased significantly from levels identified in 2006 and 2007 sampling and those identified in 2016-2018. Representative sample results for PCE and TCE are set forth on the table provided below.

Sample Location	Date Sampled	PCE (ug/L)	TCE (ug/L)
PW-1	12/19/06	44	110
Well abandoned in March 2009	4/25/07	18	120
RPW-1	4/11/16	13	7.1
	10/21/16	16	13
	1/27/17	20	13

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	12/1/17	14	4.2
	2/2018	8.8	6.2
PW-2	12/19/06	55	1300
	4/25/07	31	1800
Well abandoned in March 2009	7/31/07	42	970
RPW-2	4/11/16	16	2
	10/21/16	14	8.9
	1/27/17	13	7.4
	12/1/17	8.5	2.5
	2/2018	3.1	4.5

Since 2007, the Site has also been undergoing phased demolition and construction activities associated with the redevelopment of the Site as a shopping center known as Fullerton Crossings. During redevelopment, several areas of impacted soil were identified and remediated. In 2014, the SARWQCB documented that no further action is necessary for soil at Parcel 1 provided that the conditions and restrictions of the recorded Land Use Covenant (LUC) are met. The LUC describes specific restrictions and provisions for use of the property, in order to prevent mobilization of PCE and TCE that remain in soil and prohibits the disturbance of the soil vapor mitigation system installed beneath the Home Depot store.

Notwithstanding delays solely attributable to OCWD, the EW-1 remedy is now operational. As such, the CERCLA process is more likely to create duplication of efforts and increase oversight costs than provide any real benefit to the Site and affected community.

Summary

AR has complied with SARWQCB directives to investigate, remediate and monitor soil and groundwater at the Site. AR's concern is that placing the entire Orange County North Basin on the National Priorities List will result in duplication of effort and increased investigation, cleanup and

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oversight costs with respect to individual sites where investigation and remediation activities are well under way or are nearly complete. Activities typically required under the CERCLA process have already been addressed. For those reasons, AR requests that EPA decline to place the Orange County North Basin on the NPL.

Respectfully submitted, ›

A handwritten signature in black ink, appearing to read "William E. Hvidsten", with a long horizontal line extending to the right.

William E. Hvidsten
Assistant General Counsel
Aerojet Rocketdyne, Inc.
2001 Aerojet Road
Rancho Cordova, CA 95742
916-351-8524